



City of Long Beach
Department of Health
and Human Services

Los Angeles County
Department of Public Health

City of Pasadena
Public Health Department

County of Riverside
Department of Public Health

Santa Barbara County
Public Health Department

County of San Bernardino
Department of Public Health

County of San Diego
Health and Human Services
Agency

Ventura County
Public Health

Mary Nichols, Chairperson
California Air Resources Board
1001 I Street
Sacramento, CA 95814
CC: Clerk of the Board

July 28, 2017

Dear Chairperson Nichols and Members of the Board,

The Public Health Alliance of Southern California (Alliance) is a coalition of nine health departments in Southern California. Our departments are collectively responsible for the health of over 60% of California's population. We strive to prevent the conditions that cause poor health, well before residents must visit the doctor's office. In service of this mission, we appreciate the continued opportunity to contribute this experience to the process to update the regional greenhouse gas emissions (GHG) reduction targets required by Senate Bill 375 (SB 375). ***We write this comment letter to support the Air Resources Board (ARB) staff recommendation for greenhouse gas emission reduction targets for MPOs in our region, specifically because these targets will:***

- Reduce congestion and vehicle miles traveled (VMT), which will improve public health and address health inequities in our region, especially in our most disadvantaged communities
- Encourage a shift to more sustainable transportation modes including walking and bicycling, which will have important health and equity benefits
- Better align our regional GHG targets with the State's GHG targets identified in the Scoping Plan, and set a clear and ambitious VMT reduction targets in both policies
- Encourage use of new financial resources, including the recently-passed Senate Bill 1, Measure M and Volkswagen settlement, along with the Greenhouse Gas Reduction Fund, on projects that will reduce greenhouse gas emissions and improve health.

The prestigious British medical journal, *The Lancet*, has identified climate change as the "biggest global health threat of the 21st century."¹ As public health professionals charged with protecting and promoting the health of the population, the Alliance is particularly committed to addressing the disproportionate health impacts of climate change on vulnerable populations.

As a result, ***we support the leadership that the California Air Resources Board (CARB) has taken in implementing SB 375 and putting forth recommended targets for each Metropolitan Planning Organization (MPO) to reduce greenhouse gas emissions in their respective regions.*** These targets present an important

¹ The Lancet Health and Climate Commission, Climate & Health, available at: <http://thelancet.com/climate-andhealth>

opportunity at a critical time to improve public health and protect California residents from the health impacts of climate change. The MPOs in the Southern California region have made significant progress since this process began in 2008, setting ambitious targets for 2020 and 2035 and making greater investments in active transportation, transit, affordable housing and other sustainability-related efforts. Yet many health inequities remain, and the benefits of these investments and impacts on health and climate change are not equitably distributed across our regions. There are additional opportunities to ensure we are creating healthy places for all Californians.

We support ARB's recognition of regional differences in setting these targets, especially in the Southern California Association of Governments (SCAG), San Diego Association of Governments (SANDAG) and Santa Barbara regions. Each of these regions is unique, and it will take interventions of different scales to reduce greenhouse gas emissions equitably. Transportation accounts for 37% of greenhouse gas emissions in the State of California, and this is largely due to the congestion in the major metropolitan areas that make up our regions.² ***This congestion overwhelmingly impacts disadvantaged communities that are located near major freeways, ports and heavily traveled corridors.*** The amount of time we spend in our cars takes away from going to the gym, cooking a healthy meal, spending time with friends and family, and enjoying the beautiful beaches, mountains and parks we have in our State. ARB's staff recommendations can help decisionmakers in our regions find opportunities to reduce congestion and vehicle miles traveled with public health and health equity in mind.

We support strategies that reduce greenhouse gas emissions while also encouraging a shift to more sustainable transportation modes, which will have important health and equity benefits. The ARB staff report highlights how investing more in active transportation and transit service can help reduce greenhouse gas emissions. These investments can also lead to significant reductions in rates of chronic disease and increased rates of physical activity. For example, a recent study by SCAG looked at the economic impacts of active transportation and found that implementing its 2016 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), which calls for \$12.9 billion in active transportation investments through 2040, could reduce health care costs by \$226 million, and save another \$111 million indirectly through productivity gains.³ The land use and transportation strategies called for in the RTP/SCS would also reduce the percentage of obese adults by 3%, those with diabetes by 11%, high blood pressure by 1% and poor health outcomes in general by 13%. A healthier transportation system would also help us directly reduce our greenhouse gas emissions. A San Francisco Bay Area study found that increasing biking and walking from 4 to 24 minutes a day on average would reduce rates of cardiovascular disease and diabetes by 14% and decrease greenhouse gas emissions by 14%.⁴ This shift to active transportation could help us meet California's ambitious climate goals while also improving the health of our residents.

We commend ARB for integrating clear and ambitious VMT reduction targets into the SB 375 target-setting process. The Alliance submitted [comments](#) on the AB 32 Scoping Plan in March, asking that the Plan integrate VMT reduction targets into the process to update these targets, and we are pleased that ARB has incorporated this suggestion. Reducing VMT can be one of the most effective ways to reduce greenhouse gas emissions, increase walking and bicycling trips and reduce auto-related injuries and fatalities. As the staff report states, it can take as little as everyone reducing their driving by a half mile per day to reduce GHG emissions to a significant degree. SCAG in particular notes in its 2016 RTP/SCS that around 38% of trips in its six-county region are under three miles and could be potentially replaced

² California Air Resources Board, *Greenhouse Gas Inventory by Sector*, available at <https://www.arb.ca.gov/cc/inventory/data/data.htm>.

³ Southern California Association of Governments, 2016. *Active Transportation Health and Economic Impacts Study*, available at https://www.scag.ca.gov/programs/Documents/AT-HealthImpactStudy/2016ATHealthEconomicImpactStudy_REPORT.pdf

⁴ Maizlish, N. et al, 2012. *Health Cobenefits and Transportation-Related Reduction in Greenhouse Gas Emissions in the San Francisco Bay Area*, available at <https://www.ncbi.nlm.nih.gov/pubmed/23409903>

by active transportation if the right infrastructure was in place: SCAG has a “Short Trips Strategy” to incentivize this modal shift.⁵

We encourage the use of new financial resources, including the recently-passed Senate Bill 1, Measure M and Volkswagen settlement, along with the Greenhouse Gas Reduction Fund, on projects that will reduce greenhouse gas emissions and improve health. We recognize that incentivizing the types of investments that will reduce greenhouse gas emissions and improve public health will require new resources to become available, as well as a reallocation of existing resources. Thankfully, several new funding programs have recently become available to help us meet this challenge:

- The State has recently passed Senate Bill 1, providing over \$7 billion in transportation funding over the next 10 years;
- The State continues to fund sustainable transportation projects through the Greenhouse Gas Reduction Fund and Active Transportation Program;
- The Volkswagen settlement provides funding for sustainable transportation in disadvantaged communities; and
- Regions such as Los Angeles County have passed sales taxes to invest more money into transportation.

While these additional resources cannot cover the entire cost of meeting ARB’s proposal, we encourage ARB and the MPOs to use them for purposes that improve public health and decrease health inequities.

ARB’s proposal for SB 375 targets is an opportunity for MPOs in our region to rise to the challenge of becoming healthier, more equitable and smarter about addressing climate change. The Alliance is deeply thankful for your efforts to address climate change and protect the health of California residents through this target update process and related climate change efforts.

Thank you for your leadership on this issue, and your consideration of our recommendations. We look forward to continued work with you to ensure a sustainable and healthy future for our state.


Sincerely,



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⁵ Southern California Association of Governments, *2016 Regional Transportation Plan and Sustainable Communities Strategy*, available at <http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS.pdf>